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 Attorneys for Plaintiffs
 Mei Ying Liu and Shu Fang Chen
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AT 8:30

WILLIAM T. WILSON, CLERK

**UNITED STATES DISTRICT COURT
 FOR THE DISTRICT OF NEW JERSEY**

MEI YING LIU and SHU FANG CHEN,
 Plaintiffs,

v.

ORIENTAL BUFFET, INC., d/b/a KING CHEF
 BUFFET; METROPOLITAN BUFFET
 CORPORATION, d/b/a METROPOLITAN
 BUFFET; AN NA ZHENG; XIAO YANG
 ZHENG; BEN LIANG ZHU; FRANK CHAN,
 a/k/a KAI TUNG CHEN, a/k/a KAI TONG
 CHEN, a/k/a KAI CHIANG CHAN, a/k/a KAI
 CHEUNG CHAN, a/k/a KAI CHEONG CHAN;
 and DE GI CHING, a/k/a TEH QI CHING, a/k/a
 JIMMY CHING,

Defendants.

Civil Action No. 03-2406 (KSH)

Honorable Katharine S. Hayden, U.S.D.J.

**STATEMENT OF DAMAGES
 FOR COUNTS 1 THROUGH 5
 OF THE ORIGINAL COMPLAINT**

Mei Ying Liu

| | |
|---|-------------|
| Counts 1 and 2 | \$77,846.60 |
| Unpaid minimum wages (\$5.15 X 3040 hours) | \$15,656.00 |
| Unpaid overtime (\$7.73 X 3010 hours) | \$23,267.30 |
| Subtotal | \$38,923.30 |
| Federal liquidated damages | \$38,923.30 |
| Counts 3 and 4 (state and federal Equal Pay Acts) | \$45,500.00 |
| Average difference compared to male waiters (\$13000 X 17.5 months) | \$22,750.00 |

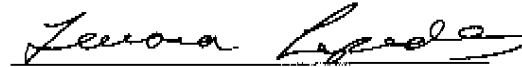
| | |
|---|---------------------|
| Federal liquidated damages | \$22,750.00 |
| Count 5 (kickbacks) | \$7,512.00 |
| (\$108 X 39 weeks) + (\$90 X 35 weeks) + (\$75 X 2 weeks) | \$7,512.00 |
| Subtotal | \$130,858.60 |
| <u>Shu Fang Chen</u> | |
| Counts 1 and 2 | \$17,053.00 |
| Unpaid minimum wages (\$5.15 X 680 hours) | \$3,502.00 |
| Unpaid overtime (\$7.73 X 650 hours) | \$5,024.50 |
| Subtotal | \$8,526.50 |
| Federal liquidated damages | \$8,526.50 |
| Counts 3 and 4 (state and federal Equal Pay Acts) | \$8,000.00 |
| Average difference compared to male waiters (\$1000 X 4 months) | \$4,000.00 |
| Federal liquidated damages | \$4,000.00 |
| Count 5 (kickbacks) | \$1,500.00 |
| (\$90 X 15 weeks) + (\$75 X 2 weeks) | \$1,500.00 |
| Subtotal | \$26,553.00 |

TOTAL

\$157,411.60

Date: July 16, 2003

Respectfully submitted,



Lenora M. Lapidus (LL-6592)

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